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January 31, 2022

The Honorable Louis L. Stanton
United States District Court for the Southern District of New York
500 Pearl Street, Courtroom 21-C
New York, New York 10007

Re: *MV Realty, PBC, LLC, v. Innovatus Capital Partners, LLC* (1:18-cv-07142); *Innovatus v. Neuman et. al.* (1:18-cv-04252)

Dear Judge Stanton:

We write in response to Innovatus' January 26, 2022 letter motion (Dkt. 276) seeking leave to file under seal certain portions of a January 26, 2022 letter filed by Innovatus on the basis of confidentiality designations made by MV Realty when producing documents pursuant to the Protective Order.¹

MV Realty has reviewed the information redacted by Innovatus, and it has concluded that the specific information — which was pulled from documents produced by MV Realty — does not require sealing.² On this basis, there is no need for the Court to grant Innovatus' motion to seal.

Sincerely,

s/ Jason C. Raofield
Jason C. Raofield

¹ All citations to "Dkt." refer to the docket in *Innovatus Capital Partners, LLC v. Neuman, et al*, No. 1-18-cv-04252-LLS (S.D.N.Y.). Innovatus filed an identical letter in *MV Realty PBC, LLC v. Innovatus Capital Partners, LLC*, No. 1-18-cv-07142-LLS (S.D.N.Y.). See Dkt. 235.

² The parties have produced documents pursuant to the Protective Order. The vast majority of Innovatus' production has been designated as Highly Confidential, as has much of MV Realty's production. With respect to sealing, while MV Realty has produced documents it believes would require such treatment, it will request such protection only when it believes the standard for sealing has been met.